

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SONTERRA CAPITAL MASTER FUND, LTD.,
on behalf of itself and all others similarly situated,

Plaintiff,

v.

BARCLAYS BANK PLC, BARCLAYS CAPITAL
INC., COÖPERATIEVE CENTRALE
RAIFFEISEN-BOERENLEENBANK B.A.,
DEUTSCHE BANK AG, LLOYDS BANKING
GROUP PLC, THE ROYAL BANK OF
SCOTLAND PLC, UBS AG AND JOHN DOE
NOS. 1-50,

Defendants.

No. 15-cv-03538 (VSB)

ECF Case

**DECLARATION OF JOHN CONNORS IN SUPPORT OF
UBS AG'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

1. I am a corporate and governance attorney at UBS AG with the rank of Executive Director. In this capacity, I am responsible for corporate and legal entity governance and general corporate matters relating to legal entities within the Investment Bank and Wealth Management divisions and the Corporate Center in the United States. I am an attorney with more than 30 years of experience in the financial services sector. I have been in-house counsel to UBS AG since 2010.

2. I make this declaration based on personal knowledge gained through the performance of my duties and my investigation of the facts herein including the review of

public disclosures made by UBS Group AG and UBS AG as well as other sources or materials that, based on my experience, I believe to be accurate and reliable.

3. UBS AG is the successor to the Bank in Winterthur, a Swiss financial institution founded in 1862. UBS AG is and always has been incorporated in Switzerland. Its global headquarters and principal place of business are located in two Swiss cities, Zurich and Basel, at Bahnhofstrasse 45, 8001 Zurich, and Aeschenvorstadt 1, 4051 Basel, respectively.

4. UBS is Switzerland's largest bank and it operates in more than 50 countries worldwide.

5. In the United States, UBS AG maintains licensed branches only in California, Connecticut, Florida, Illinois, and New York. UBS AG has four branches in New York; two in California, two in Florida; one in Connecticut; and one in Illinois. UBS AG also has direct and indirect subsidiaries in the United States.

6. In 2014, a majority of UBS AG's total operating income (including operating income of all direct and indirect subsidiaries) was attributable to regions outside of the United States. UBS AG reported a total world-wide operating income of CHF 28 billion for 2014, of which CHF 10.7 was attributable to the United States.

7. At the end of 2014, UBS AG reported that it had 60,155 full-time employees. Of these, 4,178 were located in New York.

8. No UBS AG branch or employee in the United States was responsible for the determination or submission of rates to the British Bankers Association, or BBA, for use in the calculation of British Pound Sterling LIBOR. The employees who were responsible for the determination and submission of rates to the BBA for use in the calculation of British Pound Sterling LIBOR were located in Zurich.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 2015 at
Stamford, Connecticut

A handwritten signature in black ink, appearing to read 'John Connors', is written over a horizontal line.

John Connors
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